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JUNE 17, 2016

VIA ECF

Honorable Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Rufino Cano v. Nineteen Twenty Four, Inc., et al.*
Civil Action No. 15 Civ. 4082 (RRM)(RER)

Dear Judge Reyes:

This firm represents the plaintiff in the above-referenced action. We write to inform the Court that, despite the parties' efforts to negotiate a framework for early resolution of this action, the parties have been unable to make progress towards settlement at this time. While we believe that settlement may be possible in the future, in the meantime we would like to proceed with discovery in advance of plaintiff's anticipated Motion for Class Certification pursuant to Fed. R. Civ. P. 23.

Accordingly, plaintiffs respectfully request a telephone status conference with Your Honor at your earliest convenience to implement a schedule for discovery and motion practice.

We appreciate Your Honor's attention to this matter. Please contact the undersigned should you have any questions regarding this request.

Respectfully submitted,

/s/ Taylor B. Graham

Taylor B. Graham, Esq. of
PELTON GRAHAM LLC

cc: All counsel (via ECF)